

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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DEBRA HALL, Individually and on Behalf of	:	Civil Action No. 1:07-cv-08252-SAS
All Others Similarly Situated,	:	
	:	<u>CLASS ACTION</u>
Plaintiff,	:	
vs.	:	
THE CHILDREN'S PLACE RETAIL	:	
STORES, INC., et al.,	:	
Defendants.	:	
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DAVID SALKIN, Individually and on Behalf	:	Civil Action No. 1:07-cv-08708-SAS
of All Others Similarly Situated,	:	
	:	<u>CLASS ACTION</u>
Plaintiff,	:	
vs.	:	
THE CHILDREN'S PLACE RETAIL	:	
STORES, INC., et al.,	:	
Defendants.	:	
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NOTICE OF MOTION FOR CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFF  
AND FOR APPROVAL OF SELECTION OF LEAD COUNSEL

PLEASE TAKE NOTICE that Institutional Investor Laborers Pension Trust Fund for Northern Nevada (“Northern Nevada Laborers Fund”) will hereby move this Court, on a date and at such time as may be designated by the Court, for an Order (attached hereto as Exhibit A): (i) consolidating the Actions; (ii) appointing Northern Nevada Laborers Fund as Lead Plaintiff; (iii) approving Northern Nevada Laborers Fund’s selection of the law firm of Coughlin Stoia Geller Rudman & Robbins LLP to serve as Lead Counsel; and (iv) granting such other and further relief as the Court may deem just and proper. In support of this Motion, Northern Nevada Laborers Fund submits herewith a Memorandum of Law and Declaration of Mario Alba Jr., dated November 20, 2007.

DATED: November 20, 2007

COUGHLIN STOIA GELLER  
RUDMAN & ROBBINS LLP

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*/s/ Mario Alba Jr.*  
MARIO ALBA JR.

SAMUEL H. RUDMAN  
DAVID A. ROSENFELD  
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[Proposed] Lead Counsel for Plaintiffs

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**CERTIFICATE OF SERVICE**

I, Mario Alba Jr., hereby certify that on November 20, 2007, I caused a true and correct copy of the attached:

Notice of Motion for Consolidation, Appointment as Lead Plaintiff and for Approval of Selection of Lead Counsel;

Memorandum in Support of the Motion of Laborers Pension Trust Fund for Northern Nevada for Consolidation, Appointment as Lead Plaintiff and for Approval of Selection of Lead Counsel; and

Declaration of Mario Alba Jr. in Support of the Motion of Laborers Pension Trust Fund for Northern Nevada for Consolidation, Appointment as Lead Plaintiff and for Approval of Selection of Lead Counsel,

to be served: (i) electronically on all counsel registered for electronic service for this case; and (ii) by first-class mail to any additional counsel.

/s/ Mario Alba Jr.

Mario Alba Jr.

CHILDREN'S PLACE

Service List - 11/16/2007 (07-0201)

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